

LAW OFFICES OF  
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December 28, 2016

**VIA EMAIL**

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Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed*

Dear Counsel;

I am still awaiting receipt of your respective calendars for the months of January and February 2017 so that we can schedule depositions. On December 16, 2016 I forwarded blank calendars for both months; please "x" out the days and ½ days on which you are unavailable.

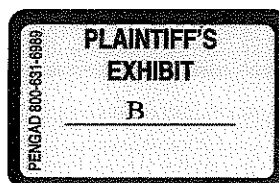
Hereinafter is my list of deponents. As I told Sarah via email on December 23, 2016, I am willing to take the depositions at your clients' facilities, at Mayfield High School, or at any other location that would cause the least disruption to your clients' business affairs.

**Cleveland Clinic Foundation Employees:**

1. A CCF 30(b)(6) employee who can discuss the various CCF sexual harassment policies and procedures, beginning with the first such policy issued on 4/1/1993, and modified thereafter
2. Garry Miller, employee #820519 (Coordinator – Athletic Training) – Ochi's Supervisor per the CCF disclosed "Employee Corrective Action Report"
3. Jeff Kain – an individual at Hillcrest Hospital who received a copy of 3/26/2003 letter from James Loewer to Dean Ochi

**Mayfield City School District Board of Education Deponents:**

1. A Mayfield City School Board (MCSB) 30(b)(6) witness who can discuss the history of Board's policies and procedures of harassment, and compliance with Title IX
2. John Paydo – Mayfield Middle School Teacher and President of Mayfield Education Association, with Duces Tecum
3. Nancy Barron – Phys Ed Teacher, Girls Track Coach
4. Anthony Capora



5. Michael Barnes
6. Keith Leffler
7. Frank Stubsky
8. Ross Bandera
9. Mrs. Valentino
10. James A. Loewer
11. Chuck Wilakas
12. Susan Beatty
13. Jim Dasher
14. Janet Barr

Although I have 14 witnesses listed to depose, probably one half of those fact witness depositions will be relatively short, in the range of 20-30 minutes. I would appreciate knowing within ten (10) days whether any of the listed witnesses have left the vicinity, either due to retirement, job change, or relocation.

Finally, please do not overlook responding timely to my recent follow up written discovery of a Second Request for Production of Documents to CCF and to the School Board, served on December 19, 2016. I need your responses prior to commencing depositions, including the Clinic's delayed response to the Plaintiffs' First Request for Production of Documents.

Very truly yours,

*/s/ Murray D. Bilfield*

Murray D. Bilfield  
BILFIELD & ASSOCIATES  
MDB/srs